

## Local Area Waiver Request for Workforce Innovation Opportunity Act (WIOA) 75% Out-of-School Youth Minimum Expenditure Requirement

The Local Workforce Development Boards (LWDB's) are seeking a waiver of the requirement under the Workforce Innovation and Opportunity Act (WIOA) §129(a)(4) and 20 CFR 681.410 that the state and LWDB's spend not less than 75 percent of youth funds to provide services to out-of-school youth (OSY).

This request is for a waiver to allow the state and all LWDB's in Oklahoma the flexibility to direct up to 50 percent of youth funds to deliver workforce and educational services to In-School-Youth (ISY), while continuing to serve OSY as a priority population.

This waiver request will help ensure the populations and strategies outlined below have the opportunity to receive services under Title 1.

### Actions the local area has undertaken to remove federal statutory or regulatory barriers;

There are no state or local statutory or regulatory barriers to implementing the requested waiver. State and LWDB's regulations and policy statements are in compliance with current federal law.

### State strategic goal(s) and Department of Labor priorities (i.e. expansion of apprenticeships, improved employer engagement, etc.) supported by the waiver;

Engage k-12

Expansion of Work-Based Learning programs including pre-apprenticeships and internships

Implementation of ICAP

Creation of the Centers of Excellence

Accountability in the measurement of skill, talent, aptitude in the workforce development pipeline (Pk-12 and postsecondary)

Broaden definition and expand eligibility of concurrent enrollment

### Projected programmatic outcomes resulting from implementation of the waiver;

Outcome: Increase and promote career pathway development initiatives

While provision of services to OSY is vital, the requirement to expend 75 percent of youth statewide and formula funds on OSY prohibits LWDB's from using discretion when serving youth based on state and local demographics, resources, economies, employment outlooks, and other labor market factors. The requirement also weakens local board's ability to design and deliver meaningful career pathway programs to all youth, regardless of school status.

Outcome: Increase the number of post-secondary certifications and credentials, including individuals with barriers and reduce high school and post-secondary dropout rates.

Consistent with WIOA's increased emphasis on credential attainment, this flexibility would allow the LWDB's to provide work-based learning opportunities, such as work experience, pre-apprenticeships and internships for ISY as specified at WIOA §129(c)(2)(C) and 20 CFR §681.600. Additionally, approval of this waiver will help ensure better collaboration with Alternative Ed and utilization of Title 1 funds for these partnerships, resulting in increased attainment rates and reduced drop out rates.

Outcome: Increase numbers of pre-apprenticeships and internships and other Work-Based Learning initiatives

Providing more work-based learning opportunities, specifically, pre-apprenticeships and internships, to ISY would allow Oklahoma to continue strengthening its commitment to developing activities that enhance the choices available to eligible youth and encourage them to complete secondary education, enroll in postsecondary education and advanced training, progress through a career pathway, and enter into unsubsidized employment that leads to economic self-sufficiency in accordance with WIOA §129(b)(2).

Outcome: Increased Labor Participation Rate

The approval of this waiver would permit LWDB's the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the population, geographical location, and economic and employment conditions of each workforce area. Increasing outreach to ISY while maintaining a focus on serving OSY will help develop a larger pool of young people qualified and prepared to meet the current and future needs of employers in their workforce areas and throughout the state.

Outcome: Increase services to at-risk youth

Approval of this waiver request will allow LWDB's to direct more local funds to serving youth at-risk of disconnecting from education in both, K-12 and post-secondary. It is more cost-effective to keep youth enrolled in school and engaged in a career pathway which leads to meaningful and satisfying careers. Post-secondary populations targeted by WIOA funds commonly, are at high risk of dropping out. To keep students engaged requires additional assistance, such as case management and supportive services that local boards provide

Outcomes: Improved flexibility of state and local funding to best meet the needs of job seekers and businesses

Approval of this waiver will allow for innovative strategies to address barriers facing at-risk youth on an individualized basis and encourage innovative strategies to address student retention, such as concurrent enrollment, work-based learning opportunities, occupational training, or pre-apprenticeship to apprenticeship programs that will keep students engaged in school through graduation.

The individuals, groups or populations impacted by the waiver;

Alternative education  
In School, at risk youth

ISY with disabilities  
Underserved populations

Description of how the local area intends to oversee effective waiver implementation and any unique protocols that may be used in their waiver requests.

Annual WIOA programmatic reviews will include an evaluation of the impact of the waiver on local programs to ensure programmatic goals and outcomes are being met.

Current required data reporting criteria elements accommodate this request. This strategy ensures that the goals described above, as well as those outlined in the State's Unified Plan and local plans, are consistent with established objectives of the WIOA and federal and state regulations.